

MEETING SUMMARY

Fuel Cycle Oversight Program Revisions Public Stakeholder Meeting on Licensee Problem Identification, Resolution, and Corrective Action Programs

When: May 8, 2001, 9:00 to 10:25 am
Where: NRC Headquarters (Room O4-B6)
Attendees: See attached sign-in sheet

Discussion:

The purpose of this stakeholder meeting was to discuss the role of licensee Problem Identification, Resolution, and Corrective Action (PIRCA) programs in the NRC's Fuel Cycle Facility Oversight Process (FCFOP). The meeting was the 10th in a series of public meetings associated with the FCFOP revision project. There were over 20 attendees, including representatives of licensees, the press, NEI, and DOE; representatives of the State of Illinois (IDNS), Nuclear Fuel Services (NFS), and Duke, Cogema, and Stone and Webster (DCS) were tied in by phone. Highlights from the meeting included:

Participants discussed at length the need to make changes in the PIRCA area. NRC staff explained that, in order to make the oversight process revisions work, licensees need to have effective and robust corrective action functions (emphasizing program effectiveness as opposed to "one size fits all" programmatic features) that would ensure that problems are corrected in a timely manner commensurate with risk. Along with that, there needs to be an equally robust corrective action oversight policy that can be consistently implemented across all NRC organizations and functional areas related to fuel cycle facility regulation.

Another issue discussed at length was the potential to use performance indicators (PIs) to measure PIRCA effectiveness. The fundamental concern expressed by some stakeholders was with the public transparency of NRC regulation in the PIRCA arena, and that the NRC needs to be able to demonstrate the bases for its conclusions on PIRCA effectiveness by providing sufficient detail in inspection reports and/or the use of PIs. Industry stakeholders expressed reservations about the feasibility of using a common set of PIs. NRC staff acknowledged the concerns about transparency, and will be sensitive to this need in preparing PIRCA inspection guidance. Staff also acknowledged that, while the use of PIs may be a viable concept, development of such indicators should be considered at a later stage in the evolution of the revised oversight process.

As a result of the aforementioned discussions, consensus was reached on the need for the NRC to periodically inspect the effectiveness of licensee PIRCA processes. The general thought was to do such inspections on a frequency coinciding with Licensee Performance Reviews (LPRs), probably near the end of each cycle, and that they would be done within existing budgeted inspection resources.

General agreement appeared to have been reached on five elements of effective PIRCA programs: Problem Recognition; Risk Significance Determination; Problem Resolution;

Corrective Action Tracking; and Management Oversight. The NRC inspection would assess licensee effectiveness in these areas. As an action item, NRC staff will tailor existing NRC PIRCA inspection guidance for use at fuel cycle facilities, and will develop NRC program guidance on how the effectiveness of licensee corrective actions will be factored into performance assessment and NRC response to performance. This guidance will be included in Inspection Manual Chapters 2600 and 2604. In addition to developing NRC oversight guidance, staff will draft an enforcement policy revision that would credit effective licensee corrective actions.

There seemed to be a common understanding that NRC PIRCA oversight would evolve along with the implementation of the recent revisions to Part 70 over the next several years (e.g., management measures and ISAs).

Industry stakeholders indicated that they did not envision a reduction of NRC core inspection effort as a result of effective PIRCA processes. Rather, they expressed the view that effective PIRCA would result in less NRC reactive effort. NRC staff agreed with this concept.

Summary of Public Meeting Feedback Forms Fuel Cycle Oversight Program (Corrective Action Programs) May 8, 2001

Although more than 20 people participated in this meeting, and NRC staff encouraged participants to provide feedback at the beginning and end of the meeting, only one feedback form (NRC Form 659) was received. The information from this form is summarized below.

1. Why did you attend this meeting?

- b. I work for an interested organization

2. Were you familiar with the meeting topic prior to coming today?

- a. Very

3. How did you find out about this meeting?

- e. Other (NEI was listed as the information source)

4. Have you attended an NRC meeting before?

- c. 3 to 5 times

5. Was sufficient notice given in advance of the meeting?

- a. Yes

6. How well do you feel you understand the NRC's role with regard to the issues discussed today?

- a. Very well

7. Were you able to find all of the supporting information you wanted prior to the meeting?

- a. Yes

8. Was the purpose of the meeting made clear in the preliminary information you received?

- a. Yes

9. In your opinion, were people's questions answered clearly, completely and candidly?

- a. Yes

10. Was the written material useful in understanding the topic?

a. Very

11. Were NRC's presentations and material presented in clear, understandable language?

a. Yes

12. In your opinion, did the meeting achieve its stated purpose?

a. Yes

13. Has this meeting helped you with your understanding of the topic?

a. Greatly

14. How well did NRC staff respond to your concerns at the meeting?

a. My concerns were directly addressed

15. Was adequate time allotted for discussion with NRC staff on the topic of today's meeting?

b. No

16. How satisfied are you overall with the NRC staff who participated in the meeting?

a. Very

17. Were the next steps in this process clearly explained, including how you can continue to be involved?

a. Yes

Contact

The respondent remained anonymous, and therefore did not desire to be contacted.

Comments

The respondent did not provide written comments.

**SIGN IN SHEET FOR 05/08/2001 MEETING ON FUEL CYCLE OVERSIGHT PROCESS
REVISIONS -- PROBLEM IDENTIFICATION, RESOLUTION, AND CORRECTIVE ACTION**

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